

EXHIBIT 28

Cause No. 2023-38238

Zurich American Insurance Company, HCC	§	In the District Court of
International Insurance Company PLC,	§	
Philadelphia Indemnity Insurance Company,	§	
Everest Reinsurance Company,	§	Harris County, Texas
Plaintiffs,	§	
v.	§	
Apache Corporation,	§	281 st Judicial District
Defendant.	§	

SWORN MOTION FOR NON-RESIDENT ATTORNEY
NICHOLAS N. SPEAR FOR ADMISSION *PRO HAC VICE*

To The Honorable District Court Judge:

Nicholas N. Spear (“Applicant”) files this Sworn Motion of Non-Resident Attorney for Admission Pro Hac Vice to appear for defendant Apache Corporation (“Apache”) and states:

1. Applicant seeks permission to appear Pro Hac Vice as counsel for Apache Corporation.

2. Applicant is an attorney with Susman Godfrey L.L.P., 1900 Avenue of the Stars, Suite 1400, Los Angeles, California 90067, nspear@susmangodfrey.com, telephone (310) 789-3108 and facsimile (310) 789-3150.

3. Applicant will be associated in this proceeding with Geoffrey L. Harrison, a resident attorney whose Texas State Bar Number is 00785947. Mr. Harrison is a partner at Susman Godfrey L.L.P. His office address is 1000 Louisiana Street, Suite 5100, Houston, Texas 77002-5096. His telephone number is (713) 651-9366. His facsimile number is (713) 654-6666. His email address is gharrison@susmangodfrey.com.

4. Applicant is an active member in good standing with the Bar of the State of California (304281); the United States District Court for the Central District of California, the United States District Court for the Eastern District of California, the United States District Court

for the Northern District of California, the United States District Court for the Southern District of California, the Ninth Circuit Court of Appeals, and the Eleventh Circuit Court of Appeals.

5. Applicant has filed an Application for Admission Pro Hac Vice with the Texas Board of Law Examiners and paid the \$250.00 filing fee under TEX. R. GOVERN. BAR ADM'N. XIX(a). The Texas Board of Law Examiners' acknowledgment letter is attached as Exhibit A.

6. Applicant has not been the subject of disciplinary actions by the bar or the courts of any jurisdiction in which he is licensed in the past five years. Applicant has not been denied admission to the courts of any state or to any federal court during the past five years.

7. Applicant is familiar with the State Bar Act, the State Bar Rules, the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas, and the Harris County Local Rules. Applicant will at all times abide by and comply with the same, so long as this lawsuit is pending and he has not withdrawn as counsel in the proceeding.

Applicant respectfully requests that the Court grant Applicant's Sworn Motion and enter an order allowing him to participate as one of the attorneys for Apache in this case.

Dated: July 6, 2023

Respectfully submitted,

By: /s/ Geoffrey L. Harrison

Geoffrey L. Harrison
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Abigail Noebels
TX State Bar No. 24083578
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Nicholas N. Spear (*pro hac vice* pending)
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Counsel for Defendant Apache Corporation

Verification

My name is Nicholas N. Spear. My date of birth is February 4, 1987. My business address is 1900 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067. I declare under penalty of perjury that the foregoing statements in this Sworn Motion of Non-Resident Attorney Nicholas N. Spear for Admission Pro Hac Vice are true and correct within my personal knowledge.

Executed in Houston, TX on the 6th day of July, 2023.

/s/ Geoffrey L. Harrison
Geoffrey L. Harrison

Certificate of Service

On July 6, 2023, a true and correct copy of this document was served on counsel of record in accordance with the TRCP via electronic filing.

/s/ Geoffrey L. Harrison
Geoffrey L. Harrison

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Charlotte Oxley on behalf of Geoffrey Harrison
 Bar No. 00785947
 coxley@susmangodfrey.com
 Envelope ID: 77301529
 Filing Code Description: Motion (No Fee)
 Filing Description: Motion
 Status as of 7/7/2023 1:56 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Geoffrey L.Harrison		gharrison@susmangodfrey.com	7/7/2023 1:12:48 PM	SENT
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Abigail Noebels		anoebels@susmangodfrey.com	7/7/2023 1:12:48 PM	SENT

EXHIBIT

A

Board of Law Examiners

Appointed by the Supreme Court of Texas

July 06, 2023

Nicholas Spear

Via: E-Mail

Acknowledgment Letter

Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: Nicholas Spear

Case: 2023-38238

Texas court or body: Harris County, 281st Judicial District

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statement required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



Nahdiah Hoang
Executive Director

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